

San Francisco Bay Conservation and Development Commission

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September 17, 2019

US Army Corps of Engineers, San Francisco District
450 Golden Gate Avenue, 4th Floor
San Francisco, CA 94102

ATTENTION: Ms. Thanh Tran

SUBJECT: US Army Corps of Engineers Draft Project Management Plan for the San Francisco Bay Regional Dredged Material Management Plan

Dear Ms. Tran:

Thank you for the opportunity to comment on the US Army Corps of Engineers' (USACE) Draft Project Management Plan (PMP) for the San Francisco Bay Regional Dredged Material Management Plan (RDMMP) and the discussion we had at the September 5, 2019 Long Term Management Strategy for the Placement of Dredged Material in the San Francisco Bay Region (LTMS) Program Managers meeting. We appreciate this early opportunity to provide input to help scope the PMP and the RDMMP. While we understand that the PMP is a USACE required document that provides structure for the RDMMP work plan and program, we are concerned that even at this early stage, the USACE appears to be ignoring the long established LTMS Program, to which the USACE is a signatory and partner agency. We believe that the RDMMP should build off of this successful program should save time, energy, and funds through direct coordination and linkage with the LTMS Management Plan.

As you are aware, the LTMS Management Program establishes programmatic goals for the placement of dredged sediment in the San Francisco Bay (Bay) region. These goals include maximizing beneficial reuse of dredged sediment, minimizing in-Bay disposal, and using the San Francisco Deep Ocean Disposal Site (SFDODS) as a "stop gap measure" when beneficial reuse is not feasible. This successful program was established through significant environmental review, including evaluation of alternatives through development of an Environmental Impact Statement and Environmental Impact Report (EIS/EIR), which identified the preferred alternative as one that included a minimum of forty percent beneficial reuse in the region, as averaged on a three year basis. The USACE and the US Environmental Protection Agency (EPA) signed a Record of Decision, adopting the program. Since that action, the Program has completed its transition period, and now is in its eighteenth year of implementation of its fifty-year program, successfully beneficially reusing over 25 million cubic yards of sediment from navigation dredging projects. The development of the LTMS Program was based on multiple studies and evaluations and should be considered the baseline from which the RDMMP is built.



The PMP should reflect this existing program and the efforts that have been undertaken to develop and support it rather than discounting it and starting anew.

As you are also likely aware, time is short for the Bay Region to take action to respond to climate change and rising seas. There is a regional consensus of managers, scientists, environmental groups, and industry that we have approximately ten years to implement significant restoration activities such that tidal marshes can reach marsh plain elevation and vegetation, creating the best opportunity for adaption to sea level rise before climate change ramps quickly up. There is also a consensus that dredged sediment use is key to creating that resilience in subsided baylands. Tidal marshes provide wave attenuation and flood benefits that local communities need to reduce the impacts of coastal flooding and increase storm surge. The LTMS Program twelve year review found this to be an urgent need and that an increase in beneficial reuse beyond that originally identified was needed. The PMP and RMMP as proposed is scheduled to take five years to complete, losing the opportunity to place dredged sediment while planning is underway. This reality highlights the need for the USACE to use the available information and program to increase placement of dredged sediment in an expedited fashion and reduce the planning timeframe.

Regarding the Draft PMP, there are specific issues beyond the overarching concern described above. The following items describe these issues in brief. We are happy to discuss any of these items in more detail.

1. Please discuss the relationship of this program to the Coastal Zone Management Act.
2. It would be useful to have a summary of the preliminary assessments of the channels summarized or available as an appendix
3. The PMP is heavily focused on in-Bay disposal and does not include active and planned beneficial reuse sites that should be considered at this early stage.
4. The Stockton Deepening Project and its potential future maintenance dredging needs should be discussed and included.
5. The Jack D. Maltester Channel is no longer necessary as the marina has been abandoned, therefore should either remove or provide an updated discussion.
6. The Larkspur Ferry Channel information is out of date and should include information regarding the more recent dredge episodes.
7. Pinole Shoal Channel – you may want to include a discussion about advanced maintenance dredging that occurs occasionally.
8. San Rafael Canal section should include a discussion of the contaminant issues at that site.
9. San Francisco Bar Channel – you may want to clarify that sand placed there is. Intended to feed the littoral cell, and potentially provide sand to the beach. I don't believe there are any studies that show that this action actually provides a beach nourishment benefit.
10. The in-bay placement discussion should include a discussion of the cumulative volume limit of 1.25 million cubic yards annually based on a three-year average.

11. The available placement sites should include at a minimum Montezuma and Cullinan Ranch Restoration Sites. The near-term sites of Bel Marin Keys and Eden Landing should also be discussed.
12. Regarding the calculation of cost and benefits, please include the habitat, coastal flooding, wave attenuation, and endangered species benefits in this evaluation.
13. A more thorough explanation of the need for regulatory and resource agency participation in the process, described in the project constraint section would be useful in understanding the effort needed and whether the agencies have the staff resources to provide the proposed level of support defined as a constraint. It is important to develop timelines that take into consideration the limited staff resources in the region.
14. BCDC has identified literature and other resources that may be helpful in the gap analysis.
15. Please provide a copy of the cited memorandum, 15 September 2015 CEWC-CO memorandum.
16. Please provide a more fleshed out Work Breakdown Structure with associated timeframes for items shown on page 16.
17. Please consider the LTMS Agencies key partners in the Communication Plan
18. Please provide the appendices for review and comment.

Lastly, we echo our partner agency, the EPA's concerns summarized here regarding the significant in-Bay disposal bias, and that it would like this document to result in changes to the LTMS program (rather than writing the DMMP to implement LTMS as much as possible). It is very important that the RDMMP process address the LTMS Management Plan, and the RDMMP's relation to it, early and directly and that "Gaps Analysis" discussion plans to include related studies and literature going back only to 1999, when dozens of focused studies that were conducted prior to that date, as well as the LTMS Management Plan and LTMS EIS/EIR which should be considered key references.

Thank you again for the opportunity to comment on the draft PMP. We look forward to the next iteration with the inclusion of the LTMS Program, and the important work the region has undertaken to beneficially reuse dredged sediment. If you have questions, or would like to further discuss these comments, please feel free to contact me at 415.352.3623 or via email at brenda.goeden@bcdca.gov. We would also be happy to reserve time at an LTMS Management Committee or Program Managers meeting to further discuss.

Sincerely,



BRENDA GOEDEN
Sediment Management Program

